

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

In Re: Asbestos Products Liability)
Litigation (No. VI))
)
This document relates to:)
)
All cases included in the list attached)
as Exhibit A)

MDL No. 875

**OWENS-ILLINOIS, INC. D/B/A O-I'S
SCREENING AND EVALUATION INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO CVLO-1 PLAINTIFFS IDENTIFIED ON EXHIBIT A**

Pursuant to Federal Rules of Civil Procedure 33 and 34, Defendant, Owens-Illinois, Inc. d/b/a O-I requests that the Plaintiffs listed in each case on the attached Exhibit A provide sworn answers to the following Interrogatories and Requests for Production of Documents within thirty (30) days.

DEFINITIONS

1. "Plaintiff" means the Plaintiff or Plaintiff's Decedent.
2. "Document" means all documents and records of any kind, whether printed, written, produced by hand, or recorded or reproduced by any mechanical, digital, or electronic process. This includes any marginal comments appearing on any document.
3. When used in connection with a person, "identify" means to state that person's full name, current or last known residential and business addresses, current or last known residential and business telephone numbers, current or last known job title and place of employment, and, if known, whether the person is living or deceased.
4. When used in connection with a document, "identify" means to state with respect to each such document: the nature and substance thereof, the date it bears, the date it was prepared, the identity or identities of the author or authors thereof; the identity of each addressee, the identity or identities of the present custodian or custodians thereof, and the present location of the document.

INSTRUCTIONS

1. If you know of any document, communication, or information but cannot give the specific information or the full information the interrogatory or request for production calls for, provide the best information you have on the subject and identify each and every person you believe to have the requested information.
2. These requests seek answers based on all information available to you, however it was obtained, and any and all information in your actual or constructive possession or knowledge, or in the actual or constructive possession or knowledge of your attorneys, agents or representatives.
3. If you claim that your answer to an interrogatory (or a part thereof) or a response to a request for the production of documents (or a part thereof) is privileged or otherwise protected from discovery, identify the information or documents by subject matter and state with particularity the nature and basis of your claim.
4. If you object to any part of an interrogatory or request for production of documents, state the basis of your objection and also respond to all parts to which you do not object.

INTERROGATORIES

1. Identify all doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities involved in screenings or medical evaluations of Plaintiff for an asbestos-related disease, and the services performed by each such person or entity.
2. Identify all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

Respectfully submitted this 18th day of September, 2011.

OWENS-ILLINOIS, INC. d/b/a O-I



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CERTIFICATE OF SERVICE

I, John M. Seebohm, do hereby certify that I have this date served the above and foregoing on counsel for the Plaintiffs identified on Exhibit A hereto via first class U.S. Mail and via email, and via email to all counsel for Defendants.

THIS, the 18th day of September, 2011.



John M. Seebohm

EXHIBIT A

CVLO-1

PLAINTIFF LAST NAME	PLAINTIFF FIRST NAME	STATE	DISTRICT	LOCAL CASE #	PAID CASE #
ALSENE	DELMAR	IL	CENTRAL	00-1011	08-CV-92187
ANUSZKIEWICZ	ROMAN	IN	NORTHERN	00-00493	08-CV-90938
BEMENT	JAMES	IN	NORTHERN	00-0033	10-CV-67615
BLACK	JOHN	IL	CENTRAL	99-2268	10-CV-68110
BROOKS	RAY	IL	CENTRAL	00-1214	08-CV-92194
BROWNLEE	THEODORE	IL	CENTRAL	02-2084	08-CV-91954
BURTON	ALICE	IL	CENTRAL	99-2213	08-CV-92139
CENTERS	ALBERT	IL	NORTHERN	02-8702	08-CV-90268
COHEN	RONALD	IN	SOUTHERN	00-0024	09-CV-64755
CRADDOCK	JOHN	IL	CENTRAL	00-2023	10-CV-68114
CRAVEN	JOHN	IN	NORTHERN	00-0042	10-CV-67678
CRYPE	GEORGE	IL	CENTRAL	00-2161	08-CV-91940
DALTON	JACK	IL	CENTRAL	01-2014	08-CV-91944
DUAL	MONTE	IL	CENTRAL	01-4008	08-CV-92314
FADLER	DONALD	IL	NORTHERN	01-2428	08-CV-90220
GABBARD	BEN	IL	CENTRAL	99-2140	08-CV-92151
GABBARD	ROBERT	IL	CENTRAL	99-2140	08-CV-92145
GARD	ROBERT	IN	NORTHERN	00-0004	10-CV-67613
GARECHT	ROBERT	IL	CENTRAL	99-2184	08-CV-92134
GREEN	ROBERT	IL	CENTRAL	99-4077	08-CV-92311
HELPERS	CARL	IL	CENTRAL	00-1234	08-CV-92196
HENNEY	JEAN	IN	SOUTHERN	99-0175	09-CV-64629
HESS	ROY	IL	CENTRAL	00-1003	08-CV-92180
HOLDEN	MICHAEL	IL	CENTRAL	00-2125	08-CV-92154
KRUSE	PATRICK	IL	CENTRAL	00-CV-3110	08-CV-91867
MARCOGLIESE	FRANK	IL	SOUTHERN	00-0009	08-CV-89497
MARTIN	DAVID	IL	CENTRAL	09-2308	10-CV-61109
MEISCHNER	GISELA	IL	CENTRAL	00-1191	08-CV-92192
MOORE	GEORGE	IL	CENTRAL	00-3332	08-CV-91869
MORR	LEE	IL	CENTRAL	00-2049	08-CV-92152
NALL	EVELYN	IL	NORTHERN	00-2206	08-CV-90084
O'KEEFE	ROBERT	IL	CENTRAL	06-1308	08-CV-92210
PRATHER	JAMES	IL	NORTHERN	91-7931	08-CV-89745
RASNER	DONALD	IL	CENTRAL	00-2005	08-CV-92143
REINHARDT	GARY	IL	CENTRAL	99-2151	08-CV-92131

EXHIBIT A**CVLO-1**

PLAINTIFF LAST NAME	PLAINTIFF FIRST NAME	STATE	DISTRICT	LOCAL CASE #	PA-ED CASE #
REINOEHL	DONALD	IL	SOUTHERN	01-4029	08-CV-89460
SCHUCK	WALTER	IL	CENTRAL	01-1048	08-CV-92205
SCHURTZ	MICHAEL	IL	CENTRAL	96-01112	08-CV-91742
THOMAS	GLENDEL	IL	CENTRAL	01-1049	08-CV-92206
UNZICKER	LEONARD	IL	SOUTHERN	11-00224	11-CV-66288
WALKER	CLARENCE	IL	CENTRAL	99-2207	08-CV-92136
WIKER	PHILIP	IL	CENTRAL	01-01170	08-CV-92207